

ENFORCEMENT CONFIDENTIAL – Not Releasable Under Freedom of Information Act
Spill Prevention Control and Countermeasures Inspection
COMPLIANCE INSPECTION REPORT

COS SAMOA PACKING COMPANY
TUNA CANNERY

Inspection Date: January 28, 2008

SPCC Case No.: 08-xxxx

Administrative Information

							Draft	Final
SPCC Case #	08-xxxx	Inspection Date	01-28-08	Report Date	02-26-08	Report Version	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Name	Address	City	State	Zip			
Facility	COS Samoa Packing Company, Inc. Tuna Cannery	P.O. Box 957	Pago Pago	AS	96799	Check if same as above		
Owner Name	Chicken of the Sea International					<input checked="" type="checkbox"/>		
Operator Name						<input checked="" type="checkbox"/>		
Facility Startup	1995	Hours of Operation	24	hrs/day	7	days/wk		
Additional Information	Photographs taken during the site visit are included in Attachment A. The SPCC Plan is included in Attachment B. The facility utilizes diesel fuel and gasoline, as well as lubricating oils and grease to power equipment and to facilitate operations. Waste oil is generated from these processes and is stored in a tank onsite. Additionally, vegetable oil used in the canning process is stored in a 57,000 gallon tank on the south side of the plant. A federal inspection was conducted in response to a 4200 gallon diesel release from a diesel generator day tank, which occurred on January 3-4, 2008; all but 200 gallons were recovered.							

Inspectors		
Name	Agency/Company	Phone
Norwood Scott	U.S. Environmental Protection Agency	415-972-3373
Will Sili	American Samoa Environmental Protection Agency	684-633-2304

Primary Facility Contacts		
Name	Title	Phone
Willem Martins	General Manager	684-258-1880 E. wmartins@sampac.com
Samuel Augspurger	Environmental Representative	684-258-4049 E. saugspurger@sampac.com

Facility Description

Type of Business:	SIC Code	4009	Description	Tuna Cannery	
				2 x 20,000	
Petroleum Storage:	Total Gallons	123,680	No. of ASTs	gals.	Total AST Gallons 123,680
			No. of USTs	NA	Total UST Gallons NA
			No. of PCs	Varies	Total PC Gallons 300-500
			No. of Op. equip using oil	NA	Total Gallons NA
Facility Information:	Total Acreage	~10	Wholly contiguous site?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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Nearest Water Body
Surface Water: **Name:** Pago Pago Harbor **Distance to Water Body:** adjacent
Drainage Pathway to Nearest Water Body: A discharge of oil coupled with a failure of the containment systems and drainage control measures at Samoa Packing would enter Pago Pago Harbor.

Inspection Scope

This inspection was conducted in conformance with the protocol outlined in U.S. Environmental Protection Agency (EPA) Region IX Draft "SPCC Inspection Protocol" dated January 10, 2003, to ascertain the facility's compliance with the Final Rule for Title 40 *Code of Federal Regulations* (40 CFR) Part 112 published on July 17, 2002.

Findings

General-Facility Attributes:

Attribute complies with guidelines?	Yes	No	Comments
SPCC Plan requirements 112.1-112.5		X	Inadequate – Violation #3
General drainage controls 112.7(c)			Not addressed
Inspections, Tests and Records 112.7(e)		X	Inadequate – Violation #1
Personnel Training 112.7(f)		X	Inadequate – Violation #4
Security 112.7(g)	X		Adequate (Physical).
Tank car loading/unloading 112.7(h)			Not applicable
Facility Drainage 112.8(b)	X		Adequate
Bulk Storage Containers 112.8(c)		X	Inadequate – Violation #2
Subpart C Bulk Storage Containers-Vegetable Oils		X	Inadequate – Violation #2
Transfer Operations, Pumping, Facility process 112.8(d)	X		Adequate

To demonstrate compliance with the SPCC regulations, please provide evidence including written and/or photographic documentation within sixty (60) days from the date this package is received. Evidence must demonstrate your facility's full compliance with the SPCC violations listed below. Please send all documentation to Norwood Scott at the following address:

Norwood Scott, Technical Advisor
Pacific Islands Office
U.S. EPA Region 9
75 Hawthorne Street, CED-6
San Francisco, California 94105

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Violation:	1
Type:	Written Procedures and Inspection Records
Observation:	Inspections and tests required by 40 CFR Part 112.7(e) are not in accordance with written procedures developed for the facility; the records are not signed by the appropriate supervisor or inspector; are not kept with the plan; and are not maintained for three years. The most recent version of the Plan was not on file at the facility.
Requirement:	40 CFR § 112.7(e) requires inspections and tests to in accordance with the written procedures developed for the facility. Please submit daily, monthly, and annual inspection reports for the month of March. The forms can be found in the SPCC Plan: 4 th Revision, dated May 26, 2004.
Violation:	2
Type:	Inspection
Observation:	Accumulations of oil were observed in two locations of the facility outside primary containers: 1) Secondary containment area for the bulk storage container containing soy bean oil; and 2) the underground piping run from the Diesel Tanks #1 & #2 to the plant (Photos No. 1 & 2). All oil contaminates within the secondary containment areas for Diesel Tanks #1 & #2 and the soy bean oil bulk tank must be cleaned of oil staining and accumulations. The proper disposal of this waste oil must be documented. COS should implement more stringent spill prevention measures at these and all oil handling locations throughout the facility.
Requirement:	40 CFR § 112.8(c)(10) requires that visible discharges of oil be promptly corrected and that accumulations of oil be removed and the problem corrected. Please submit written or photo proof that these corrections have been made.
Violation:	3
Type:	SPCC Plan Review
Observation:	There has been no management approval of revised 05/26/04 Plan.
Requirement:	40 CFR § 112.7 requires management and engineer approval of the Plan. Please submit page 1 of the Plan with signatures from both James Cox and Willem Martins.
Violation:	4
Type:	Inspection
Observation:	There has been no documented training on the discharge procedure protocols {112.7(f)(1)}; no training on the contents of the SPCC Plan {112.7(f)(1)}; and spill prevention briefings are not scheduled or conducted periodically {112.7(f)(3)}. Facility representatives were unaware that they had a current SPCC plan. The federal inspector was originally given the June 3, 1996 Plan to review instead of the current May 26, 2004 version.
Requirement:	40 CFR § 112.7(f) requires training regarding discharge procedure protocols, contents of the SPCC Plan, and spill prevention briefings. Please implement these training protocols as outlined in the Plan.

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Violation:	5
Type:	Inspection - Piping
Observation:	Buried metal piping is not corrosion protected with protective wrapping, coating, or cathodic protection. One area of exposed piping was replaced after a leak was discovered. According to the facility operator, the rest of the piping runs are slated to be replaced with stainless steel piping. Periodic integrity testing and leak testing of buried piping has not been conducted (Photo No. 2 & 3).
Requirement:	40 CFR § 112.8(d) requires buried metal piping to be corrosion protected with protective wrapping, coating, or cathodic protection. Periodic integrity and leak testing of buried metal piping is also required. Please submit evidence that buried metal piping has either been replaced or repaired and protected from corrosion. If COS decides to repair, rather than replace, please submit leak test documentation.
AOC: 1	Ammonia cylinders (2), located next to the bulk diesel tanks, show significant corrosion. Please submit evidence that this issue has been addressed (Photo No. 4).
AOC: 2	The diesel generator day tank is venting into the plant rather than outside the plant into open air. If the bypass valve is open like it was at the time of the spill, there is no spill or overfill protection, there is no return line to the bulk diesel tanks, and no high liquid level alarm or cutoff devices. Please submit evidence that this issue has been addressed (Photos No. 5 & 6).

Acronyms

API American Petroleum Institute
AOC Area of concern
AST Aboveground storage tank
CFR *Code of Federal Regulations*
NAIC North American Industrial Classification

OWS Oil/water separator
PC Portable containers
SPCC Spill Prevention Control and Countermeasure
UST Underground storage tank
WWTS Wastewater treatment system

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ATTACHMENT A

PHOTO LOG

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Photo No. 1: Significant amount of soybean oil outside secondary containment.

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Photo No. 2: Oil residue observed in piping trench. Note that the metal piping is not protected from corrosion.

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Photo No. 3: A leaking section of piping that was recently replaced.

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Photo No. 4: Severely corroded ammonia cylinder.

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Photo No. 5: Diesel day tank venting in the plant rather than outside. The 4200 gallon overfill originated from this vent pipe.

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Photo No. 6: The bypass valve was left open at the time of the overfill.